

1 THE HONORABLE TIMOTHY W. DORE
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UNITED STATES BANKRUPTCY COURT

WESTERN DISTRICT OF WASHINGTON

8 In re

9 JAN MATHIESON,

10 Debtor.

11 JAN MATHIESON,

12 Plaintiff,

13 vs.

14 PHH MORTGAGE CORPORATION, a
corporation; OCWEN LOAN
SERVICING LLC, a corporation; and
15 WESTERN PROGRESSIVE-
WASHINGTON INC, a corporation,

16 Defendants.

Chapter 13

Case No.: 17-12265

Adversary No.: 19-01140

DECLARATION OF RYAN S. MOORE
IN SUPPORT OF PHH MORTGAGE
CORPORATION'S AND WESTERN
PROGRESSIVE-WASHINGTON,
INC.'S SUPPLEMENTAL OPPOSITION
TO PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION

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18 I, Ryan S. Moore, hereby declare as follows:

19 1. I am over the age of eighteen (18), competent to testify, and make the following
20 statements based on my personal knowledge.

21 2. I am counsel of record for the Defendants.

22 3. To the best of my knowledge, a sale of the Property located at 476 Bronson Way
23 NE, Renton Washington 98056 (the "Property") is scheduled for February 7, 2020.

DECLARATION OF RYAN S. MOORE

CASE NO. 19-01140

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HOUSER LLP
600 University St., Ste. 1708
Seattle, WA 98101
PH: (206) 596-7838
FAX: (206) 596-7839

4. On January 2, 2020, I contacted Plaintiff's counsel to provide an updated payoff quote good through February 1, 2020, to pay off the Loan on the Property prior to the scheduled sale. The payoff quote amount is \$201,291.68. I have attached a redacted version of the payoff quote which I sent to Plaintiff's counsel as Exhibit 1.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: January 2, 2020

s/ Ryan S. Moore
Ryan S. Moore (WSBA # 50098)

DECLARATION OF RYAN S. MOORE
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HOUSER LLP
600 University St., Ste. 1708
Seattle, WA 98101
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CERTIFICATE OF SERVICE

I the undersigned declare as follows: I am over the age of 18 years and am not a party to this action. On January 2, 2020, I served the foregoing document(s): DECLARATION OF RYAN S. MOORE IN SUPPORT OF PHH MORTGAGE CORPORATION'S AND WESTERN PROGRESSIVE-WASHINGTON, INC.'S SUPPLEMENTAL OPPOSITION TO PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION in the manner described below:

Joy Lee Barnhart
15 S. Grady Way, Ste 535
Renton, WA 98057
ecf@joybarnhart.com
Counsel for Plaintiff/Debtor

- U.S. Mail, Postage Prepaid
- UPS Overnight
- UPS 2 Day Shipping
- CM/ECF
- Courier

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: January 2, 2020

s/ *Shawn Williams*
Shawn Williams